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8	WALMAKI INC.			
9	UNITED STA	TES DISTRICT COURT		
10	DISTRI	ICT OF NEVADA		
11				
12	TIFFANIV COLORZANIO I 1' '1 1			
13	TIFFANY SOLORZANO, an Individual;	Case No. 2:21-cv-00109-JAD-VCF		
14	Plaintiff,			
15	VS.	STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES		
16	WALMART, INC., a Foreign Corporation; DOES 1 Through 25, inclusive, and ROE	[FIRST REQUEST]		
17	CORPORATIONS 1 Through 25, inclusive,	[FIRST REQUEST]		
18	Defendants.			
19				
20	Pursuant to Local Rule IA 6-1 a	nd Local Rule 26-3, Defendant WALMART, INC.		
21		("Defendant") and Plaintiff TIFFANY SOLORZANO ("Plaintiff"), by and through their undersigned		
22				
		scovery Plan and Scheduling Order (ECF No. 18) by		
23	extending the outstanding discovery deadlines for a period of ninety (90) days.			
24	This is the first request for an extension to the Discovery Plan and Scheduling Order in thi			

This is the first request for an extension to the Discovery Plan and Scheduling Order in this matter. The requested extension is sought in good faith and not for purposes of undue delay. This request is submitted at least twenty-one (21) days or more before the expiration of the subject deadlines.

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## **DISCOVERY COMPLETED TO DATE**

The parties served their initial disclosures on March 10, 2021. Defendant propounded its First Set of Interrogatories and Requests for Production of Documents on March 23, 2021. Plaintiff responded to Defendant's written discovery requests on April 23, 2021. On April 28, 2021, Plaintiff served Plaintiff's first supplement to initial disclosures. On April 29, 2021, Defendant deposed Plaintiff. On May 27, 2021, Defendant served its first supplement to initial disclosures. On June 16, 2021, Plaintiff propounded written Requests for Production of Documents, Request for Admissions and Interrogatories on Defendant. Defendant's response deadline to Plaintiff's discovery is July 16, 2021. On June 25, 2021, Defendant served its Second Set of Requests for Production of Documents. Plaintiff's responses are due on July 26, 2021. On June 28, 2021, Plaintiff served Plaintiff's second supplement to initial disclosures. Plaintiff and Defendant are also discussing dates to notice a 30(b)(6) deposition of Defendant.

## **DISCOVERY THAT REMAINS TO BE COMPLETED**

Written discovery is ongoing in this case. The parties will review each other's discovery responses and engage in the meet and confer process as needed. The parties are currently engaged in the meet and confer process on Plaintiff's Responses to Requests for Production and Answers to Interrogatories. Defendant intends to issue subpoenas for records (which subpoenas will be dependent on Plaintiff's discovery responses, which Defendant is in the process of reviewing). Defendant will require time to review the subpoenaed records, assess the need for third-party depositions concerning the subpoenaed records, and take additional depositions. Plaintiff also intends to review Defendant's written discovery responses, issue additional written discovery as needed, and notice depositions.

## REASONS FOR EXTENSION TO COMPLETE DISCOVERY

This extension is necessary to allow both parties ample time to complete all appropriate discovery. Specifically, additional time is needed to complete written discovery and receive responses to third-party subpoenas, as well as notice and take depositions and conduct additional third-party discovery. The parties believe that, absent any unforeseen circumstances, all necessary discovery can be accomplished by the requested extended deadline. Good cause exists to extend all deadlines in order to permit the parties to achieve their respective stated discovery goals.

1	REVISED DISCOVERY PLAN		
2	1. <u>Discovery Cut-Off Deadline</u>		
3	The discovery cut-off deadline shall be extended for ninety (90) days from July 26, 2021 to		
4	Monday, October 25, 2021 [Deadline is a Sunday moved to Monday].		
5	2. <u>Amending the Pleadings and Adding Parties</u>		
6	The deadline to amend the pleadings and add parties passed on April 27, 2021 and shall not be		
7	extended.		
8	3. Fed. R. Civ. P. 26(a)(2) Disclosures (Experts)		
9	The expert disclosure deadline passed on May 27, 2021 and shall not be extended.		
10	4. <u>Rebuttal Expert Disclosures</u>		
11	The rebuttal expert disclosure deadline passed on June 28, 2021 and shall not be extended.		
12	5. <u>Dispositive Motions Deadline</u>		
13	The dispositive motion deadline shall be extended for ninety (90) days from August 25, 2021		
14	to Tuesday, November 23, 2021.		
15	6. <u>Joint Pretrial Order Deadline</u>		
16	If no dispositive motions are filed, and unless otherwise ordered by the Court, the joint pretrial		
17	order deadline shall be filed thirty (30) days after the date set for filing dispositive motions, and		
18	therefore, not later than Thursday, December 23, 2021. In the event dispositive motions are filed,		
19	the date for filing the Joint Pretrial Order shall be suspended until thirty (30) days after the Court enters		
20	a ruling on the dispositive motions or otherwise by further order of the Court.		
21	7. Fed. R. Civ. P. 26(a)(3) Disclosures		
22	Unless the Court orders otherwise, the disclosures required in Fed. R. Civ. P. 26(a)(3) and any		
23	objections thereto shall be included in the pretrial order.		
24	8. <u>Extensions or Modification of the Discovery Plan and Scheduling Order</u>		
25	In accordance with Local Rule 26-3, any stipulation or motion for modification or extension		
26	of this discovery plan and scheduling order must be made at least twenty-one (21) days prior to the		
27	expiration of the subject deadline.		
28	Accordingly, the parties stipulate, subject to approval of this Court, to the following new 3.		

-	Discovery Cut-Off		Revised Deadline	
<u>-</u>	,	July 26, 2021	Monday, October 25, 202	21
	Dispositive Motions	August 25, 2021	Tuesday, November 23, 2	2021
	Joint Pretrial Order and Disclosures	September 24, 2021	Thursday, December 23, 2021	If dispositive motions are fithe deadline for filing the journal order will be susper until 30 days after decision—the dispositive motions or
D-4-	- 1. I-l 2 2021		D.4. J. Jl. 2 2021	further court order.
	ed: July 2, 2021		Dated: July 2, 2021	
Resp	pectfully submitted,		Respectfully submitted,	
/s/ Patrick W. Kang PATRICK W. KANG, ESQ.		/s/ Steven J.T. Washington Z. KATHRYN BRANSON, ESO.		
KYLE R TATUM, ESQ. TIFFANY S. YANG, ESQ. KANG & ASSOCIATES, PLLC		Z. KATHRYN BRANSON, ESQ. STEVEN J.T. WASHINGTON, ESQ. LITTLER MENDELSON, P.C.		
Attorneys for Plaintiff TIFFANY SOLORZANO		Attorneys for Defendant WALMART INC.		
7 8 IT IS SO ORDERE			IT IS SO ORDERED.	
			7-2-2021 Dated:	
			Conte	all C
			UNITED STATES MA	
1815	3342-8464.1 / 080000-4158			
+043-3	<i>JJ</i> 74-04U4.1 / U0UUUU-4138			

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